

# **EXHIBIT G**

**From:** [Hacker, Gary](#)  
**To:** [Shen, Andrew C.](#); [Newman, Jeremy S.](#); [Ratner, Peter S.](#); [Fumerton, Robert A.](#); [Bender-Nash, Sarah](#)  
**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories  
**Date:** Wednesday, June 10, 2015 12:20:15 PM

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Andy – Below is our proposed schedule. Under our proposed schedule, the dates in New York and Kansas would be the same. This schedule is still subject to sign-off from our client.

Substantial Completion of supplemental document production: September 1, 2015  
Fact Discovery Ends: September 30, 2015  
Opening Expert Reports: November 13, 2015  
Rebuttal Expert Reports: February 5, 2016  
Reply Expert Reports: March 7, 2016  
Expert Discovery Ends: April 8, 2016  
Summary Judgment Motions Due: April 29, 2016  
Summary Judgment Motions – fully submitted: June 23, 2016

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**From:** Shen, Andrew C. [<mailto:ashen@khhte.com>]  
**Sent:** Tuesday, June 09, 2015 6:52 PM  
**To:** Newman, Jeremy S.; Hacker, Gary J (NYC); Ratner, Peter S.; Fumerton, Robert A (NYC); Bender-Nash, Sarah (NYC)  
**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories

Gary –

Does 1pm tomorrow work for this call? Can you also please send us any counter-proposal to the schedule before tomorrow's call so that we can discuss?

Thanks,

Andy

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**From:** Newman, Jeremy S.  
**Sent:** Monday, June 08, 2015 4:39 PM  
**To:** Hacker, Gary; Ratner, Peter S.; Fumerton, Robert A; Bender-Nash, Sarah  
**Cc:** Shen, Andrew C.  
**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories

Gary,

Peter will be unavailable, but Andy and I should be around. What time on Wednesday do you prefer?

Jeremy

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**From:** Hacker, Gary J [<mailto:Gary.Hacker@skadden.com>]  
**Sent:** Monday, June 08, 2015 12:37 PM  
**To:** Ratner, Peter S.; Fumerton, Robert A; Bender-Nash, Sarah  
**Cc:** Shen, Andrew C.; Newman, Jeremy S.

**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories

We are available on Wednesday. Let us know if that works for you. Thanks.

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**From:** Ratner, Peter S. [<mailto:pratner@khhte.com>]  
**Sent:** Friday, June 05, 2015 9:36 AM  
**To:** Hacker, Gary J (NYC); Fumerton, Robert A (NYC); Bender-Nash, Sarah (NYC)  
**Cc:** Shen, Andrew C.; Newman, Jeremy S.  
**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories

Gary,

I understand that Rob was not prepared to discuss UBS's responses to NCUA's third set of interrogatories at yesterday's deposition. Can you please let us know when you are available to meet and confer about this issue today or Monday?

Thanks,  
Peter

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**From:** Hacker, Gary J [<mailto:Gary.Hacker@skadden.com>]  
**Sent:** Monday, June 01, 2015 8:41 PM  
**To:** Ratner, Peter S.; Fumerton, Robert A; Bender-Nash, Sarah  
**Cc:** Shen, Andrew C.; Newman, Jeremy S.  
**Subject:** RE: UBS's Response to NCUA's Third Set of Interrogatories

Peter,

We propose including this issue in Thursday's meet-and-confer.

Best,  
Gary

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**From:** Ratner, Peter S. [<mailto:pratner@khhte.com>]  
**Sent:** Friday, May 29, 2015 1:33 PM  
**To:** Hacker, Gary J (NYC); Fumerton, Robert A (NYC); Bender-Nash, Sarah (NYC)  
**Cc:** Shen, Andrew C.; Newman, Jeremy S.  
**Subject:** UBS's Response to NCUA's Third Set of Interrogatories

Gary,

I write regarding UBS's responses to NCUA's third set of interrogatories, which included only Interrogatory No. 12. That interrogatory requests, "[f]or each Specified Security for which UBS did not act solely as an underwriter, . . . Your employees responsible for selecting the Mortgage Loans securitized into that Specified Security and . . . the principal or material criteria for selecting the Mortgage Loans securitized into that Specified Security." Your response is deficient in two primary ways.

First, UBS's Exhibit A to its response includes "[a] list of structurers, traders, collateral analysts and loan level due diligence personnel who took part in the relevant securitizations." This list of every individual from those groups generally involved in the securitizations does not constitute a sufficient response to NCUA's request. As was true of UBS's amended response to NCUA's Interrogatory No. 11, UBS's response to Interrogatory No. 12 – which

includes as many as 13 individuals per security – in no way indicates which UBS employees had ultimate responsibility for selecting the mortgage loans securitized into any security. Please amend your response by Friday, June 5, to identify the specific individuals with ultimate responsibility for loan selection for each security for which UBS did not act solely as an underwriter. See Order, ECF 179 (May 21, 2015) (ordering UBS to “identify[] by name those employees with ultimate responsibility for ensuring the accuracy of the identified statements”).

Second, UBS’s response provides no information at all regarding the principal or material criteria for selecting the Mortgage Loans. Instead, UBS generally cites prospectus supplements’ descriptions of “characteristics of the Mortgage Loans securitized into a particular security.” Interrogatory No. 12 plainly seeks UBS’s principal or material criteria for selecting loans, not just the bare results of that selection process. For example, MARM 2007-2 includes loans from seven distinct whole loan purchases and one conduit purchase, with settlement dates ranging from January 2005 to February 2007. To fully answer this interrogatory, UBS must provide the principal or material criteria for selecting those loans for inclusion in that deal. NCUA has no way of determining those criteria from the prospectus supplements’ descriptions of loan pools. Please amend your response by Friday, June 5, to provide the principal and material criteria. See Order, ECF 179 (May 21, 2015) (ordering UBS to describe the “principal and material efforts” requested by NCUA’s Interrogatory No. 11).

Best,  
Peter

Peter Ratner  
Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.  
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(202) 326-7976

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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